



RECEIVED

September 4, 2009

Mr. Ivan Huntoon  
Director, Central Region  
Pipeline and Hazardous Materials Safety Administration  
Central Region Office  
901 Locust Street, Suite 462  
Kansas City, MO 64106-2641

RE: CPF 3-2009-5010

Dear Mr. Huntoon:

ONEOK NGL Pipeline L.P. respectfully submits this response to the subject Notice of Probable Violation and Proposed Compliance Order, received by ONEOK on August 18, 2009.

The Notice states that a probable violation of 49CFR Part 195.561(a) and (b), occurred during construction of the Overland Pass pipeline, from Mile Post 438 to 459 and Mile Post 591.1 to 626.6. The two areas total 56.5 miles.

**Notice of Probable Violation:**

- **Part 195.561(a) and (b)** - ONEOK NGL Pipeline L.P. acknowledges the probable violation, as described in the August 12, 2009 letter signed by Mr. Ivan Huntoon, Director, Central Regional, PHMSA.

**Proposed Compliance Order:**

1. Per PHMSA proposal 1, ONEOK NGL Pipeline L.P. agrees to run an initial in-line inspection tool (ILI) that is capable of determining metal loss, between the 2<sup>nd</sup> and 3<sup>rd</sup> year from start up, (Oct 2010 to Oct 2011). Additionally, a second ILI will be completed no later than the third year following the first inspection and a third ILI will be completed within five years of the second inspection, unless ILI results require shorter intervals. ONEOK NGL Pipeline L.P. will submit the ILI schedule for the first run within 30 days of the Final Order, as requested.
2. At this time, ONEOK NGL Pipeline L.P. is planning to follow PHMSA proposed alternative 1, rather than PHMSA proposed alternative 2. However, if data becomes available that indicates alternative 2 would provide improved integrity information, ONEOK would like to reserve the right to adjust the plan, after notifying the Director, Central Region.

Re: ONEOK NGL Pipeline L.P.  
August 31, 2009

Re: Response to CPF 3-2009-5010  
Page 2

3. ONEOK NGL Pipeline L.P. will make the results of each tool run, the data evaluations, and information on the type and date of repairs, available to the Director, Central Region, Pipeline and Hazardous Materials Safety Administration (PHMSA) on a quarterly basis for each survey period involved, as requested.
4. ONEOK NGL Pipeline L.P. will maintain documentation of the safety improvement costs associated with fulfilling this Compliance Order and will submit the total to the Director, Central Region, PHMSA. The costs will be reported in two categories, as requested.

If there are any questions related to this response or to the details of the proposed integrity management plan, please contact Bill Bromley at 918-588-7615, 918-284-6718, or by email at [bill.bromley@oneok.com](mailto:bill.bromley@oneok.com).

Sincerely,



Wes Christensen  
Senior Vice President, Operations  
ONEOK NGL Pipeline L.P.